

# EXHIBIT D

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF  
NORTH CAROLINA

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DANIEL MCTIERNAN, : No. 7:23-cv-00535-BO  
Plaintiff :  
v. :  
UNITED STATES OF :  
AMERICA, :  
Defendant :

- - -

JANUARY 25, 2024

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Videotape Deposition of  
DANIEL MCTIERNAN, taken pursuant to  
notice, was held at Peter Rodino Federal  
Building, 970 Broad Street, Suite 700,  
Newark, New Jersey 07102, commencing at  
10:26 a.m., on the above date, before  
Amanda Dee Maslynsky-Miller, a Court  
Reporter and Certified Realtime Reporter.

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1 APPEARANCES:

2

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ALSO PRESENT:

20 Daniel Ortega, Videographer

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1                   But I wanted to just sort of  
2   walk through your -- your DPP form here.

3                   So Question 43 states, What  
4   diseases or injuries does the claimant  
5   assert are related to exposure to water  
6   at Camp Lejeune?

7                   Do you -- do you see that?

8           A.     Yes.

9           Q.     And you've checked, Bladder  
10   cancer?

11          A.     Yes.

12          Q.     Okay. And then, Other, you  
13   have there, Atrial fibrillation.

14                 Do you see that?

15          A.     Yes.

16          Q.     Okay. Hyperthyroidism.

17          A.     Yes.

18          Q.     Do you see that?

19                 Non-toxic nodular goiter.

20                 Do you see that?

21          A.     Yes.

22          Q.     Hepatic cysts?

23          A.     Yes.

24          Q.     Diverticulitis?

1 A. Diverticulitis?

2 Q. Yeah. Or losis?

3 ATTORNEY MANDELL: Losis.

4 BY ATTORNEY ANWAR:

5 Q. Yeah.

6 Do you see that?

7 A. Yes.

8 Q. And dental issues.

9 A. Yes.

10 Q. Do you see that?

11 Just based on your DPP, are  
12 these -- these are all -- are these all  
13 conditions you're claiming were caused by  
14 water at Camp Lejeune?

15 ATTORNEY MANDELL: I would  
16 just object and say don't mention  
17 conversations that you've had with  
18 your attorneys.

19 But if you can answer it,  
20 please go ahead and answer it.

21 THE WITNESS: Yes, these are  
22 all --

23 ATTORNEY MANDELL: Outside  
24 of that.

1                   THE WITNESS:  -- all ones  
2                   that I've identified as possibly  
3                   or probably, not being able to  
4                   come up with any other activity  
5                   that's taken place, and looking at  
6                   my family history, my siblings,  
7                   we've all grown up and worked  
8                   somewhat the same, I'm the only  
9                   one with these issues.  No one  
10                  else has them.

11                  The only constant that I can  
12                  see coming in here that would  
13                  cause those would be Camp Lejeune  
14                  water -- well, not Camp Lejeune  
15                  water, the poisoning effects of  
16                  Camp Lejeune water.

17  BY ATTORNEY ANWAR:

18                  Q.     Okay.  Got it.

19                  Are there any other health  
20                  issues that you've experienced that you  
21                  have identified or believe are the result  
22                  of Camp Lejeune water?

23                  ATTORNEY MANDELL:  And,  
24                  again, just no communications with